

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

**VERIZON COMMUNICATIONS INC.,
CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS, AND VERIZON CORPORATE
SERVICES GROUP INC.,**

Defendants.

Civil Action No. 2:25-cv-00156

(Lead Case)

JURY TRIAL DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

T-MOBILE USA, INC., AND SPRINT LLC,

Defendants.

Civil Action No. 2:25-cv-00164

(Member Case)

JURY TRIAL DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

**AT&T SERVICES, INC., AT&T MOBILITY,
LLC AND AT&T CORP.,**

Defendants.

Civil Action No. 2:25-cv-00215

(Member Case)

JURY TRIAL DEMANDED

JOINT STIPULATION REGARDING SUBSTITUTION OF AT&T CORP.

Plaintiff Headwater Research LLC (“Headwater”) and Defendants AT&T Services, Inc., AT&T Mobility, LLC, and AT&T Corp. (now known as AT&T Enterprises, LLC) (“Defendants”)

by and through their undersigned counsel, hereby respectfully submit the following stipulation and request for an order substituting AT&T Corp. with its successor-in-interest AT&T Enterprises, LLC.

WHEREAS on February 18, 2025, Headwater filed suit against the Defendants for alleged infringement of U.S. Patent Nos. 11,966,464, 11,985,155, 8,639,935, 8,832,777, and 9,973,930 (the “Patents-in-Suit”) in the Eastern District of Texas, Case No. 2:25-cv-00215.

WHEREAS the Defendants represent and warrant that in 2024 AT&T Corp. underwent a corporate restructuring pursuant to which, through a series of transactions, AT&T Corp. merged with and into AT&T Enterprises, Inc., which then converted to AT&T Enterprises, LLC. As a result of these transactions, AT&T Enterprises, LLC became the successor-in-interest to AT&T Corp.¹;

WHEREAS, in order to avoid burdening the Court and the parties with motion practice, the parties have agreed to substitute AT&T Enterprises, LLC as a defendant in place of its predecessor-in-interest AT&T Corp. as if AT&T Enterprises, LLC (as a successor-in-interest to AT&T Corp.) had been originally named as a defendant;

IT IS THEREFORE STIPULATED AND AGREED, subject to the approval of the Court, that:

1. The parties agree to substitute AT&T Enterprises, LLC as a defendant in place of its predecessor-in-interest AT&T Corp., and that such substitution relates back as if AT&T

¹ For purposes of clarification, the description of AT&T Enterprises, LLC as the successor-in-interest to AT&T Corp., and AT&T Corp. as the predecessor-in-interest to AT&T Enterprises, LLC in this Stipulation and the accompanying proposed order is not a concession by the AT&T Defendants that AT&T Enterprises, LLC or AT&T Corp. have or had any interest or role in the subject matter of the AT&T Action; to the contrary, the AT&T Defendants dispute that AT&T Corp. or AT&T Enterprises, LLC have any interest or role in the facts or matters at issue in the action.

Enterprises, LLC (as a successor-in-interest to AT&T Corp.) was originally named as a defendant and as contemplated by Federal Rule of Civil Procedure 15(c).

Date: April 28, 2025

/s/ Reza Mirzaie

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**ATTORNEYS FOR PLAINTIFF,
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Respectfully submitted,

/s/ Nicholas Mathews

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**AT&T ENTERPRISES, LLC, AT&T
MOBILITY LLC, AND AT&T
SERVICES INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on April 28, 2025

/s/ Nicholas Mathews
Nicholas Mathews